



Elena Fast

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June 11, 2024

Via ECF

The Honorable Phillip M. Halpern
U.S. District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Application granted. The sentencing scheduled for 6/13/2024 is adjourned to the Court's next available date on 9/3/2024 at 11:30 a.m. The Court will advance the sentencing date if an earlier date becomes available.

It is the Government's responsibility to have the defendant produced to Courtroom 520 at that time.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 12, 2024

Re: United States v. Christopher Erskine, 20-cr-626 (PMH)

Dear Judge Halpern:

We represent Christopher Erskine on the above-captioned case. We write with the consent of the Government ahead of sentencing, scheduled for June 13, 2024, to request a 30-day adjournment due to an incident involving Mr. Erskine that occurred on June 7, 2024 at MDC Brooklyn.

On the evening of June 9, 2024, we received an email from paralegal Nato Chelidze, who had visited Mr. Erskine earlier that day, informing us that Mr. Erskine had been slashed twice about the head and face in an unprovoked attack by another inmate. The attack occurred while Mr. Erskine was speaking to three Lieutenants and three Correctional Officers in the "bubble" of Unit 71 in MDC. Mr. Erskine suffered a six inch gash from the top of his right cheek to his chin and on the back of his head. As a result, he is heavily bandaged and "looks pretty bad" as per Ms. Chelidze. The incident is currently under investigation by a Special Investigative Supervisor (SIS). It should be noted that defense counsel was not contacted by MDC staff, and only learned of this incident after receiving Ms. Chelidze's email.

Ms. Fast conferred with Ms. Chelidze via phone and was advised that Mr. Erskine is respectfully seeking a brief adjournment of his sentencing. On June 9, 2024, after speaking with Ms. Chelidze, we notified the U.S. Attorney's Office about the incident at MDC. The U.S. Attorney's Office has been in touch with MDC Legal, and AUSA Felton notified us this morning that he consents to a 30-day adjournment of Mr. Erskine's sentencing.

Accordingly, we respectfully request a 30-day adjournment of sentencing so that Mr. Erskine may heal physically, get the bandages removed, and gather himself after this traumatic ordeal. Thank you for your time and consideration of this request.

Respectfully submitted,

s/ Elena Fast
Elena Fast, Esq.
The Fast Law Firm, P.C.

s/ Michael Perkins
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cc: All Counsel of Record (via ECF)